

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

HTC CORPORATION,

Defendant.

Civil Action No. 2:16-cv-01096-JRG-RSP

**JURY TRIAL DEMANDED  
PATENT CASE**

**DECLARATION OF DAVID K. WIGGINS**

I, David K. Wiggins, declare as follows:

1. I am over twenty-one years of age, have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.

2. I am the Executive Patent Litigation Director of HTC America, Inc. I have been employed by HTC America, Inc. since 2009.

3. I submit this declaration in support of Defendant HTC Corporation's Motion for Summary Judgment of Noninfringement of the Asserted Claims of the '467 Patent.

4. I and several other individuals received an email on behalf of HTC Corporation on October 5, 2016 from a law firm in Tyler, Texas with the Salazar complaint attached. That was HTC Corporation's first notice of any alleged infringement of the '467 Patent. That also was HTC Corporation's first knowledge of the '467 Patent.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 2/12/2018

/s/ David K. Wiggins  
David K. Wiggins